

**IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN**

MARLEEN M. LAPLANT, on her own behalf
and on behalf of a class similarly situated,

Plaintiffs,

v.

Case No. 2:11-CV-00910

THE NORTHWESTERN MUTUAL
LIFE INSURANCE COMPANY,

Defendant.

**CLASS COUNSEL'S DECLARATION IN SUPPORT OF PLAINTIFFS'
MOTION FOR FINAL APPROVAL OF SETTLEMENT, AWARD OF
ATTORNEYS' FEES, EXPENSES AND INCENTIVE AWARDS, FINAL
JUDGMENT OF DISMISSAL AND RELATED RELIEF**

I, George P. Kersten, declare as follows:

1. I am a co-lead counsel for the Settlement Class certified by the order entered herein March 26, 2015. I make this declaration to identify the documents being filed in support of the accompanying motion for final approval of the proposed settlement of this case and related cases, award attorney fees and expense reimbursement to class counsel, incentive awards to class representatives, implementation of the settlement, and dismissal of this action.

2. Attached are the following:

EXHIBIT A: Declaration of Shannon R. Wheatman, Ph.D., on
Implementation and Adequacy of Notice Plan.

EXHIBIT B: Affidavit of Rebecca A. Blake Concerning Notification
and Settlement Administration Services.

EXHIBIT C: Declaration of Jonathan E. Schwartz Regarding Class-Wide Damages.

EXHIBIT D: Declaration of Edward A. Infante.

EXHIBIT E: Counsel's Lodestar Totals

EXHIBIT F: Declaration of George P. Kersten
Exhibit 1: Firm Resume of Kersten & McKinnon, S.C.
Exhibit 2: Summary Schedule

EXHIBIT G: Declaration of Christopher Le
Exhibit 1: Firm Resume of Straus & Boies, LLP
Exhibit 2: Summary Schedule

EXHIBIT H: Declaration of Jeffrey A. Bartos
Exhibit 1: Firm Resume of Guerrieri, Clayman, Bartos & Parcelli, PC
Exhibit 2: Summary Schedule

EXHIBIT I: Declaration of David Boies
Exhibit 1: Firm Resume of Boies, Schiller & Flexner LLP
Exhibit 2: Summary Schedule

EXHIBIT J: Declaration of Mark B. Pollack
Exhibit 1: Firm Resume of Galanis, Pollack, Jacobs & Johnson, S.C.
Exhibit 2: Summary Schedule

EXHIBIT K: Declaration of James G. Feiber
Exhibit 1: Firm Resume of Salter Feiber PA
Exhibit 2: Summary Schedule

EXHIBIT L: Declaration of Dick A. Semerdjian
Exhibit 1: Firm Resume of Schwartz Semerdjian Cauley & Moot LLP
Exhibit 2: Summary Schedule

EXHIBIT M: Declaration of Kim D. Stephens
Exhibit 1: Firm Resume of Tousley Brain Stephens PLLC
Exhibit 2: Summary Schedule

EXHIBIT N ("W.Doc."): Milwaukee County Circuit Court Docket for *LaPlant v. Northwestern Mutual* (Case No. 2008-CV-11988)

EXHIBIT O (“Fed.Doc.”): United States District Court for the Eastern District of Wisconsin docket for *LaPlant v. Northwestern Mutual* (Case No. 2:11-CV-00910)

EXHIBIT P (“F.Doc.”): United States District Court for the Northern District of Florida for *Krueger v. Northwestern Mutual* (Case No. 1:10-CV-00128)

EXHIBIT Q (“C.Doc.”): United States District Court for the Central District of California, Western Division for *Becher v. Northwestern Mutual* (Case No. 2:10-CV-06264)

3. Plaintiffs have paid \$238,308 in costs for the Court-approved Notice Program, designed and implemented by Kinsella Media, LLC.

I declare under penalty of perjury pursuant to the laws of the State of Wisconsin that the foregoing statements of fact are true and correct.

Executed this 6th day of July, 2016 in Milwaukee, Wisconsin.

/s/ George P. Kersten
George P. Kersten